

Richard Morin (SBN 285275)  
Law Office of Rick Morin, PC  
555 Capitol Mall Suite 750  
Sacramento, CA 95814-4508  
Phone: (916) 333-2222  
Email: legal@rickmorin.net

Attorney for Creditors James Scott, Amanda Olsen,  
Cheri Ann Salerno, Susan Farrell, Jason Reid, and  
Phyllis Hoxie Monroe

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA**

In re:

PG&E CORPORATION

and

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

Case No. 19-30088-DM  
Chapter 11  
Lead Case  
Jointly Administered

**DECLARATION OF JENNIFER S.  
DOMER IN SUPPORT OF MOTION TO  
DEEM CLAIMS TIMELY FILED OF  
JAMES SCOTT, AMANDA OLSEN,  
CHERI ANN SALERNO, SUSAN  
FARRELL, JASON REID, AND PHYLLIS  
HOXIE MONROE**

**Date:** September 22, 2020

**Time:** 10:00 am

**Location:** United States Bankruptcy Court  
450 Golden Gate Ave Ctrm 17  
San Francisco, CA 94102

**Judge:** Honorable Dennis Montali

I, Jennifer S. Domer, declare:

1. I am an attorney at the law firm of Cutter Law P.C., the attorney for James Scott, Amanda Olsen, Cheri Ann Salerno, Susan Farrell, Jason Reid, and Phyllis Hoxie Monroe.

2. I have personal knowledge of the following facts and would testify competently thereto if called as a witness. I make this declaration in support of Motion to Deem Claims Timely

1 Filed of James Scott, Amanda Olsen, Cheri Ann Salerno, Susan Farrell, Jason Reid, and Phyllis  
2 Hoxie Monroe.

3 3. In December of 2019, Cutter Law, P.C. had an established protocol in place for  
4 receiving Camp Fire retainer agreements from an agent. Under the established protocol, after  
5 obtaining the prospective client's retainer agreement, the firm's agent sent the Camp Fire retainer  
6 documentation to three people at Cutter Law: an intake clerk, a clerical person, and an attorney other  
7 than me. The receiving attorney was authorized to accept or reject the potential client; as a junior  
8 attorney, I was not.

9 4. This protocol was in place and had been effectively working since September 2019.

10 5. I left the country for vacation on or about December 19, 2019 and continued my  
11 vacation out of the country on December 30, 2019. However, upon my return from vacation on  
12 January 16, 2020, I discovered that retainer agreements for James Scott, Amanda Olsen, Cheri Ann  
13 Salerno, Susan Farrell, Jason Reid, and Phyllis Hoxie Monroe had been mistakenly sent *only* to my  
14 Gmail email account by the firm's agent. This was a mistake, and contrary to the established  
15 protocol. I had cleared my calendar before leaving for vacation and did not check my email accounts  
16 while out on vacation.

17 6. Upon discovery of the retainer agreements, I immediately forwarded the retainer  
18 agreements to attorney John Roussas, and his legal secretary Alisha Sanders.

19 I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct and that this declaration was executed on August 19, 2020, in Sacramento,  
21 California.  
22

23 

24 \_\_\_\_\_  
Jennifer S. Domer